REVIEW COMMENTS - EBR-II LEACH PIT, OU 9-02 TRACK 2 SUMMARY REPORT

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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July 14, 1994

Reply To
Attn Of: HW-124

Ms. Lisa Green
Environmental Restoration Division
Department of Energy
Idaho Field Office
785 DOE Place
Idaho Falls, Idaho 83401-1562

Re: Argonne EBR-II Leach Pit, Operable Unit 9-02
Track 2 Summary Report

Dear Ms. Green:

In a submittal received June 6, 1994 you provided the Environmental Protection Agency (EPA) a revised Preliminary Scoping Track 2 Summary Report for Operable Unit (OU) 9-02. EPA has reviewed the Report, and today's letter memorializes our recommendations for further actions at the site.

EPA concurs with DOE's recommendations for the Leach Pit. In September 1993 DOE removed contaminated sludges lying on the Pit bottom, and the Pit itself no longer remains a contaminant source.

The follow-up Track 2 screening-level assessment, however, did not "address the effects of contaminants that may lie in the basalt bedrock, i.e., beneath the Leach Pit floor." The WAG managers have yet to conclude, therefore, that disposals made to the Leach Pit over its operating life (that have subsequently migrated out of the Pit) could not pose unacceptable future risk to human health or the environment through the groundwater exposure pathway. This pathway will require assessment during the WAG 9 remedial investigation.

A specific approach for assessing the groundwater pathway during the WAG 9 remedial investigation will be proposed by DOE in future documents. Based on the information available to us at this time, however, it is EPA's position that the assessment of the Leach Pit's potential contribution to groundwater contamination should follow, to the greatest extent possible, our "Track 2 methodology." That is, rather than designing the remedial investigation to include a vigorous (and probably, less

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than conclusive) field-intensive vadose zone characterization effort, the assessment should rely on a combination of: (1) disposal history bounding estimates; (2) information from past studies; and, (3) the results of downgradient monitoring.

If you or your staff have any questions, please contact me at (206) 553-1743.

Sincerely,

Ed Jones, WAG 10 Manager
Federal Facility Section I

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